

Mark C. Mao, CA Bar No. 236165  
 Beko Reblitz-Richardson, CA Bar No. 238027  
 Erika Nyborg-Burch (admitted *pro hac vice*)  
**BOIES SCHILLER FLEXNER LLP**  
 44 Montgomery St., 41st Floor  
 San Francisco, CA 94104  
 Tel.: (415) 293-6800  
 mmao@bsflp.com  
 brichardson@bsflp.com  
 enyborg-burch@bsflp.com

James Lee (admitted *pro hac vice*)  
 Rossana Baeza (admitted *pro hac vice*)  
**BOIES SCHILLER FLEXNER LLP**  
 100 SE 2nd St., 28th Floor  
 Miami, FL 33131  
 Tel.: (305) 539-8400  
 jlee@bsflp.com  
 rbaeza@bsflp.com

Amanda K. Bonn, CA Bar No. 270891  
**SUSMAN GODFREY L.L.P.**  
 1900 Avenue of the Stars, Suite 1400  
 Los Angeles, CA 90067  
 Tel: (310) 789-3100  
 Fax: (310) 789-3150  
 abonn@susmangodfrey.com

*Attorneys for Plaintiffs*

**UNITED STATES DISTRICT COURT  
 NORTHERN DISTRICT OF CALIFORNIA**

CHASOM BROWN, WILLIAM BYATT,  
 JEREMY DAVIS, CHRISTOPHER  
 CASTILLO, and MONIQUE TRUJILLO  
 individually and on behalf of all similarly  
 situated,

Plaintiffs,

vs.

GOOGLE LLC,

Defendant.

William Christopher Carmody  
 (admitted *pro hac vice*)  
 Shawn J. Rabin (admitted *pro hac vice*)  
 Steven M. Shepard (admitted *pro hac vice*)  
 Alexander Frawley (admitted *pro hac vice*)  
**SUSMAN GODFREY L.L.P.**  
 1301 Avenue of the Americas,  
 32<sup>nd</sup> Floor  
 New York, NY 10019  
 Tel.: (212) 336-8330  
 bcarmody@susmangodfrey.com  
 srabin@susmangodfrey.com  
 sshepard@susmangodfrey.com  
 afrawley@susmangodfrey.com

John A. Yanchunis (admitted *pro hac vice*)  
 Ryan J. McGee (admitted *pro hac vice*)  
**MORGAN & MORGAN**  
 201 N. Franklin Street, 7th Floor  
 Tampa, FL 33602  
 Tel.: (813) 223-5505  
 jyanchunis@forthepeople.com  
 mram@forthepeople.com  
 rmcgee@forthepeople.com

Michael F. Ram, CA Bar No. 104805  
**MORGAN & MORGAN**  
 711 Van Ness Ave, Suite 500  
 San Francisco, CA 94102  
 Tel: (415) 358-6913  
 mram@forthepeople.com

Case No.: 5:20-cv-03664-YGR-SVK

**PLAINTIFFS' ADMINISTRATIVE  
 MOTION TO CONSIDER WHETHER  
 PORTIONS OF 30(b)(6) DEPOSITION  
 JOINT LETTER BRIEF SHOULD BE  
 SEALED**

Referral: The Honorable Susan van Keulen

Pursuant to Civil Local Rule 79-5, Plaintiffs respectfully ask the Court to consider whether Google LLC's ("Google") material should be sealed. The material is included within the parties' joint letter brief regarding Plaintiffs' 30(b)(6) deposition notices.

Document Sought to be Sealed	Party Claiming Confidentiality	Portions to be filed under seal	Basis for Sealing Portion of Document
30(b)(6) Joint Letter Brief	Google	Portions highlighted in yellow on Pages 1, 2, 3, 4, 5	Refers to material designated "Confidential" and "Highly Confidential" pursuant to the Protective Order
Exhibit A to 30(b)(6) Joint Letter Brief	Google	Portions highlighted in yellow on pages 1, 2, 3, 6, 7, 8, 15, 16, 17, 21, 22, 23, 24, 25, 26, 27, 31, 32	Refers to material designated "Confidential" and "Highly Confidential" pursuant to the Protective Order

Pursuant to Civil Local Rule 79-5(f), Google, as the Designating Party, bears the responsibility to establish that its designated material is sealable.

Dated: February 17, 2022

Respectfully submitted,

By: /s/Amanda Bonn

Amanda Bonn (CA Bar No. 270891)  
 abonn@susmangodfrey.com  
 SUSMAN GODFREY L.L.P.  
 1900 Avenue of the Stars, Suite 1400  
 Los Angeles, CA 90067  
 Telephone: (310) 789-3100

Mark C. Mao (CA Bar No. 236165)  
 mmao@bsflp.com  
 Beko Rebitz-Richardson (CA Bar No. 238027)  
 brichardson@bsflp.com  
 Erika Nyborg-Burch (*pro hac vice*)  
 Enyborg-burch@bsflp.com  
 BOIES SCHILLER FLEXNER LLP  
 44 Montgomery Street, 41<sup>st</sup> Floor  
 San Francisco, CA 94104  
 Telephone: (415) 293 6858

Facsimile (415) 999 9695

James W. Lee (*pro hac vice*)

jlee@bsfllp.com

Rossana Baeza (*pro hac vice*)

rbaeza@bsfllp.com

BOIES SCHILLER FLEXNER LLP

100 SE 2<sup>nd</sup> Street, Suite 2800

Miami, FL 33130

Telephone: (305) 539-8400

Facsimile: (305) 539-1304

William Christopher Carmody (*pro hac vice*)

bcarmody@susmangodfrey.com

Shawn J. Rabin (*pro hac vice*)

srabin@susmangodfrey.com

Steven Shepard (*pro hac vice*)

sshepard@susmangodfrey.com

Alexander P. Frawley (*pro hac vice*)

afrawley@susmangodfrey.com

SUSMAN GODFREY L.L.P.

1301 Avenue of the Americas, 32<sup>nd</sup> Floor

New York, NY 10019

Telephone: (212) 336-8330

John A. Yanchunis (*pro hac vice*)

jyanchunis@forthepeople.com

Ryan J. McGee (*pro hac vice*)

rmcgee@forthepeople.com

MORGAN & MORGAN, P.A.

201 N Franklin Street, 7th Floor

Tampa, FL 33602

Telephone: (813) 223-5505

Facsimile: (813) 222-4736

Michael F. Ram, CA Bar No. 104805

MORGAN & MORGAN

711 Van Ness Ave, Suite 500

San Francisco, CA 94102

Tel: (415) 358-6913

mram@forthepeople.com

*Attorneys for Plaintiffs*